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AZ CORP COMMISSION  
DOCUMENT CONTROL

June 30, 2006

Mr. Wilfred Shand  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

RE: Staff's 2<sup>nd</sup> Set of Data Requests to Alltel Communications, Inc. and Alltel Holding Corporate Services, Inc. - Docket No. T-03887A-05-0909 and T-20436A-05-0909

Dear Mr. Shand:

Enclosed please find the responses to Staff's 2<sup>nd</sup> set of data requests to Alltel Communications, Inc. and Alltel Holding Corporate Services, Inc.

Sincerely,

Michael W. Patten

MWP:mi  
Enclosure

cc: Docket Control (original and 15 copies)

ALLTEL COMMUNICATIONS, INC. AND  
ALLTEL HOLDING CORPORATE SERVICES, INC.'S  
RESPONSE TO STAFF'S 2<sup>nd</sup> SET OF DATA REQUESTS  
DOCKET NOS. T-03887A-05-0909 AND T-20436A-05-0909  
June 30, 2006

Please make certain that each numbered item and each part of the item is answered completely. In order for Staff to continue with its review of this application, the following information must be submitted:

STF2-1. Has the AHCSI separation into a separate holding company occurred?

**Response:** The question does not make sense. As set forth in AHCSI's previous filings, AHCSI (now Windstream Communications, Inc.) is a wholly owned subsidiary of Alltel Holding Corp. Alltel Holding Corp. currently is a wholly owned subsidiary of Alltel Corporation. Upon close of the transaction (July 17, 2006), Alltel Holding Corp. will separate from Alltel Corporation and merge with Valor Communications Group to form Windstream Corporation. At that time, AHCSI/Windstream Communications, Inc. will be a wholly owned subsidiary of Windstream Corporation.

STF2-2. How many customers does ACI have today?

**Response:** 5,312

STF2-3. When was the notice actually sent to customers?

**Response:** Customers received notice of the transaction in May and June.

STF2-4. Has AHCSI already become a subsidiary of Valor?

**Response:** No. See Response to STF2-1.

STF2-5. Identify the owners of Valor Communications Group?

**Response:** Valor Communications Group is a publicly company traded in the NYSE under the symbol VCG.

STF2-6. (A-13) in the CC&N application states the following: "Indicate if the Applicant's customers will be able to access alternative toll service providers or resellers via 1+101XXXX access." The applicant's response was that this question did not apply. Will AHCSI block calls when a customers dials 101XXXX to access other providers of long distance service?

**Response:** As a reseller, AHCSI/Windstream, Communications, Inc. does have the capability to block calls. Only an incumbent local exchange carrier can block a call at its switch location.

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STF2-7. (A-15) in the CC&N application states the following, in part: "... Provide a detailed explanation of why the applicant's superior financial position limits any risk to Arizona consumers." The applicant's response is "not applicable." Provide the financial statements of the company upon which AHCSI will rely.

**Response:** Financial information for the parent company of AHCSI/Windstream Communications, Inc. is publicly available at:

<http://ccbn.10kwizard.com/cgi/convert/pdf/VALORCOMMUNICATS4A.pdf?pdf=1&repo=tenk&ipage=4186611&num=-2&pdf=1&xml=1&odef=8&dn=2&dn=3>.

The Form S-4 for Valor Communications Group is publicly available from the Securities and Exchange Commission.

STF2-8. (A-19) in the CC&N application states the following: "List the States in which the Applicant currently offers telecommunications services similar to those that the Applicant will or intends to offer in the State of Arizona." The response is that the applicant does not currently offer resold long distance service in any state.

**Response:** Currently, AHCSI/Windstream Communications, Inc. does not provide resold long distance service in any state. Beginning on July 17, 2006, AHCSI/Windstream Communications, Inc. will acquire the existing long distance customers of Alltel Communications, Inc. and initiate operations as a long distance reseller in all states except Alaska.

STF2-9. When and how will the merger between AHCSI and Valor occur. For example, will there be a transfer of assets?

**Response:** As explained in the pleadings filed in this matter, AHCSI is not merging with Valor. See Response to STF2-1.

STF2-10. What is the value of existing unused ACI prepaid calling card minutes of use?

**Response:** Existing Alltel Communications, Inc. long distance customers will be able to continue using the full value of any prepaid calling cards that they may have once they are transferred to AHCSI/Windstream Communications, Inc.

STF2-11. Please provide an explanation for ACI's position that prepaid calling cards do not represent prepayments.

**Response:** See Response to STF2-10.

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STF2-12. In its response to (B-3) in the CC&N application, AHCSI states that it will rely on the financial resources of its parent. Identify AHCSI's parent. Provide the financial statements for the identified AHCSI parent in the form requested in item B-3.

**Response:** See response to STF2-7.

STF2-13. Indicate if the Applicant has a resale agreement in operation. If "Yes", please reference the resale agreement by Commission Docket Number or Commission Decision Number.

**Response:** AHCSI/Windstream Communications, Inc., as a long distance reseller, is not required under the Federal Telecommunications Act of 1996 or otherwise to file any service agreement it has with its underlying carriers with any state commission.

STF2-14. In the application at page 6, lines 7 – 10, the applicants state that customers will be notified at least thirty days in advance on the transfer. Is the letter provided to in the applicants' supplemental response to Staff's 1<sup>st</sup> set of data requests intended to completely fulfill the notification commitment contained in the application?

**Response:** AHCSI/Windstream Communications, Inc. previously provided to the Commission in its supplemental application a copy of the actual customer notice. Also, see Response to STF2-3.